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3 BURNS BAIR LLP

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7 *Special Insurance Counsel to The Official Committee of Unsecured Creditors*

8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 In re

Case No. 23-30564

12 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

Chapter 11

13 Debtor and Debtor in Possession.

14 **MONTHLY PROFESSIONAL FEE
STATEMENT FOR BURNS BAIR LLP
FOR SEPTEMBER 2025**

15 **TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

16 **NOTICE IS HEREBY GIVEN** that Burns Bair LLP, special insurance counsel to the
17 Official Committee of Unsecured Creditors (the “Committee”), hereby files its monthly professional
18 fee statement for the period September 1, 2025 through September 30, 2025 (the “Fee Period”),
19 pursuant to the *Order Establishing Procedures and Authorizing Payment of Professional Fees and*
20 *Expenses on a Monthly Basis* (the “Compensation Order”), entered on October 16, 2023 [ECF No.
21 212]. The total fees and expenses incurred by Burns Bair LLP on behalf of the Committee for the
22 Fee Period are as follows:

23

Period	Fees	Expenses	Total
September 1, 2025 through September 30, 2025	\$37,347.00	\$3,965.51	\$41,312.51
Net Total Allowed Payments this Statement Period (80% of fees and 100% of expenses)	\$29,877.60	\$3,965.51	\$33,843.11

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27 Attached hereto at **Exhibit 1** is Burns Bair’s itemized billing statement for its fees and
28 expenses billed during the Fee Period. Pursuant to the Compensation Order, the Net Total Allowed

1 Payments detailed in the chart above shall be paid from funds held by the estate of the Debtor, The
2 Roman Catholic Archbishop of San Francisco, unless an objection is filed with the Clerk of the
3 Court and served upon Burns Bair LLP within *14 days after the date of service* of this monthly
4 professional fee statement.

5 Dated: October 30, 2025

BURNS BAIR LLP

6
7 By: /s/ Jesse J. Bair

Jesse J. Bair

8 *Special Insurance Counsel to the Official*
9 *Committee of Unsecured Creditors*
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EXHIBIT 1

Burns | Bair

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Madison, Wisconsin 53703-3392
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www.BurnsBair.com

**Official Committee of Unsecured Creditors of
Archbishop of San Francisco**

Issue Date : 10/17/2025

Bill # : 02055

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/16/2025	Brian Cawley	Participate in state court counsel meeting for insurance purposes re case developments and next-steps (.8);	0.80	\$440.00
9/16/2025	Timothy Burns	Participate in portion of state court counsel meeting for insurance purposes (.7);	0.70	\$784.00
9/18/2025	Brian Cawley	Participate in Committee meeting for insurance purposes (1.1);	1.10	\$605.00
9/18/2025	Timothy Burns	Participate in Committee meeting for insurance purposes re case developments and next-steps (1.1);	1.10	\$1,232.00
9/22/2025	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case strategy (.6);	0.60	\$672.00
9/22/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation developments and strategy (.6);	0.60	\$540.00
9/26/2025	Timothy Burns	Participate in Committee meeting re mediation issues (.9);	0.90	\$1,008.00
9/26/2025	Brian Cawley	Participate in Committee meeting for insurance purposes re mediation issues (.9);	0.90	\$495.00
Totals for Committee Meetings			6.70	\$5,776.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/2/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and certificate of service (.2); correspond with J. Bair (.1);	0.30	\$102.00
9/2/2025	Brenda Horn-Edwards	File and serve Burns Bair monthly professional fee statement (.2);	0.20	\$68.00

9/10/2025	Jesse Bair	Review fee examiner's final report re 5th interim applications and correspond with B. Horn-Edwards re preparing proposed Order granting same (.2);	0.20	\$180.00
9/11/2025	Jesse Bair	Review docket order approving interim fee applications, review and edit proposed Order granting same, and correspond with fee examiner and B. Horn-Edwards re same (.3);	0.30	\$270.00
9/11/2025	Brenda Horn-Edwards	Lodge proposed order re Burns Bair fifth interim fee application with Court and correspond with J. Bair re same (.2);	0.20	\$68.00
9/30/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and certificate of service (.2); correspond with J. Bair (.1);	0.30	\$102.00
9/30/2025	Brenda Horn-Edwards	File and serve Burns Bair monthly professional fee statement (.2);	0.20	\$68.00
9/30/2025	Jesse Bair	Review and edit monthly fee statement (.1);	0.10	\$90.00
Totals for Fee Applications			1.80	\$948.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/4/2025	Jesse Bair	Attend status conference for insurance purposes (.7);	0.70	\$630.00
Totals for Hearings			0.70	\$630.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/1/2025	Brian Cawley	Revise and update aggregate insurance demand (1.5);	1.50	\$825.00
9/2/2025	Jesse Bair	Review Court's docket order granting lift stay motion and related correspondence with Committee professionals and the Committee re same and additional case developments (.2);	0.20	\$180.00
9/2/2025	Timothy Burns	Review court order re lift stay and demand letters (.1); correspondence with Committee professionals re same (.2);	0.30	\$336.00
9/2/2025	Timothy Burns	Review correspondence with Committee professionals and the Committee re mediation issues (.2);	0.20	\$224.00
9/2/2025	Timothy Burns	Review Debtor's 9/4/25 status conference statement (.1); review correspondence with the Committee and debtor re mediation issues (.2);	0.30	\$336.00
9/2/2025	Timothy Burns	Prepare for upcoming mediation session (.9);	0.90	\$1,008.00

9/3/2025	Timothy Burns	Participate in mediation session (6.0); participate in post-session conference with Committee professionals re outcome, strategy, and next-steps (.4);	6.20	\$6,944.00
9/3/2025	Jesse Bair	Prepare for mediation session (.2); participate in full-day mediation session for insurance purposes (6.0); participate in post-session conference with Committee professionals re outcome of same, next-steps, and strategy (.4);	6.60	\$5,940.00
9/4/2025	Brian Cawley	Draft summary of status conference outcome (.2);	0.20	\$110.00
9/10/2025	Timothy Burns	Analysis re insurance demand strategy issues and brief review of research memo in connection with same (.3);	0.30	\$336.00
9/10/2025	Jesse Bair	Analyze consequential damages / bad faith law in connection with ongoing negotiations (.3);	0.30	\$270.00
9/16/2025	Brian Cawley	Draft summary re outcome and key takeaways from state court counsel meeting (.2);	0.20	\$110.00
9/16/2025	Timothy Burns	Conference with J. Bair re outcome of state court counsel meeting and related insurance strategy (.2); participate in additional call with state court counsel re case insurance and mediation strategy (.2);	0.40	\$448.00
9/16/2025	Jesse Bair	Review summary re outcome of state court counsel meeting and conference with T. Burns re same and mediation next-steps (.2);	0.20	\$180.00
9/17/2025	Jesse Bair	Review the insurers' motion for stay pending appeal of lift stay ruling and notice of appeal (.4); review and respond to correspondence with the debtor, insurers, and Committee professionals re same and briefing issues (.2);	0.60	\$540.00
9/17/2025	Jesse Bair	Review correspondence with Committee professionals re mediation developments (.1);	0.10	\$90.00
9/17/2025	Timothy Burns	Review correspondence with the Debtor and Committee professionals re the insurers' stay pending appeal motion (.2);	0.20	\$224.00
9/17/2025	Timothy Burns	Review Insurers' Motion to Stay Pending appeal (.4); review correspondence with Committee professionals re upcoming Committee meeting (.1);	0.50	\$560.00
9/18/2025	Timothy Burns	Participate in meet and confer with the insurers and debtor re stay pending appeal issues (.3); participate in post-meet and confer conference with the debtor re outcome of same and next-steps (.3);	0.60	\$672.00

9/18/2025	Timothy Burns	Participate in conference with Committee professionals re stay pending appeal and other lift stay appellate issues (.5);	0.50	\$560.00
9/18/2025	Timothy Burns	Brief review of revised draft insurance demand letter template (.2); review and respond to correspondence with Committee professionals re same (.2);	0.40	\$448.00
9/18/2025	Timothy Burns	Review and respond to B. Michael correspondence re insurance demands (.2);	0.20	\$224.00
9/18/2025	Timothy Burns	Review J. Stang's comments on the insurers' motion for stay pending appeal and related correspondence re appeal stay briefing with the debtor and Committee professionals (.3);	0.30	\$336.00
9/18/2025	Jesse Bair	Participate in meet and confer with the insurers re lift stay appeal and stay issues (.3); participate in post-meet and confer conference with the debtor and Committee professionals re same and potential response to the insurers' proposal (.3); participate in conference with Committee professionals re same and strategy re opposing the insurers' motion for stay (.5);	1.10	\$990.00
9/18/2025	Brian Cawley	Review and revise insurance demand letter template (.5);	0.50	\$275.00
9/19/2025	Jesse Bair	Review and respond to various correspondence with the debtor, insurers, and Committee professionals re lift stay appeal and stay issues and the insurers' proposal re same (.4);	0.40	\$360.00
9/22/2025	Timothy Burns	Review and respond to B. Michael correspondence re Committee and state court counsel meetings (.1);	0.10	\$112.00
9/22/2025	Timothy Burns	Review various correspondence correspondence with Committee professionals, the Committee, and state court counsel re mediation issues (.3);	0.30	\$336.00
9/22/2025	Timothy Burns	Review Century's notice of appeal (.1);	0.10	\$112.00
9/22/2025	Timothy Burns	Review and respond to correspondence with J. Bair re CNA meet and confer re stay pending appeal requests (.2);	0.20	\$224.00
9/22/2025	Jesse Bair	Participate in call with CNA re lift stay appeal issues (.3); follow-up correspondence with Committee professionals re same and next-steps (.3);	0.60	\$540.00
9/22/2025	Jesse Bair	Review correspondence with the Committee professionals, the Committee, and state court counsel re mediation developments (.2);	0.20	\$180.00
9/24/2025	Brian Cawley	Respond to J. Bair request re insurer demands (.2);	0.20	\$110.00

9/25/2025	Brian Cawley	Continue reviewing and revising insurance demand letters (1.1);	1.10	\$605.00
9/26/2025	Jesse Bair	Review and edit the Committee's response to the insurers' motion to stay lift stay order (1.2);	1.20	\$1,080.00
9/26/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re mediation and related Committee meeting (.3);	0.30	\$336.00
9/26/2025	Brian Cawley	Finish drafting revised version of insurance demand letter templates (2.4);	2.40	\$1,320.00
9/26/2025	Timothy Burns	Participate in conference with B. Michael re insurance demand letters (.4); review correspondence from B. Cawley re same (1.);	0.50	\$560.00
9/29/2025	Jesse Bair	Review T. Burns' suggested edits to the Committee's response to the insurers' motion to stay (.1);	0.10	\$90.00
9/29/2025	Timothy Burns	Review and revise draft response brief re motion to stay pending appeal (.8);	0.80	\$896.00
9/30/2025	Timothy Burns	Review correspondence with the Committee professionals and state court counsel re mediation issues (.1);	0.10	\$112.00
9/30/2025	Timothy Burns	Review final version of opposition to motion to stay pending appeal (.2);	0.20	\$224.00
9/30/2025	Jesse Bair	Review final version of the Committee's opposition to the insurers' motion for stay (.2); review the debtor's opposition to same (.3);	0.50	\$450.00
9/30/2025	Jesse Bair	Review the insurers' statement of issues on appeal and record designations (.2);	0.20	\$180.00
Totals for Insurance Recovery Activities			32.30	\$29,993.00
Total Hours and Fees			41.50	\$37,347.00

EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/02/2025	Delta Airlines, J. Bair (MSN-SFO, Sept. 2-3)	\$998.37
09/02/2025	Delta Airlines, T. Burns (MSN-SFO, Sept. 2)	\$669.18
09/02/2025	Postage	\$1.07
09/03/2025	Taxi, J. Bair and T. Burns (airport to hotel)	\$107.92
09/03/2025	Travel meal, J. Bair	\$30.58
09/03/2025	Uber, J. Bair (hotel to airport)	\$73.53
09/04/2025	United Airlines, T. Burns (SFO-MSN, Sept. 5)	\$506.74
09/04/2025	Hotel, T. Burns (2 nights)	\$852.00
09/04/2025	Hotel, J. Bair (1 night)	\$501.31
09/04/2025	Uber, T. Burns (hotel to airport)	\$138.34

09/04/2025	MSN Airport Parking, T. Burns	\$26.00
09/04/2025	MSN Airport Parking, J. Bair	\$20.00
09/04/2025	Travel meal, T. Burns	\$39.11
09/30/2025	Postage	\$1.36
Total Expenses		\$3,965.51

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	1.20	\$340.00	\$408.00
Brian Cawley	Associate	8.90	\$550.00	\$4,895.00
Jesse Bair	Partner	14.20	\$900.00	\$12,780.00
Timothy Burns	Partner	17.20	\$1,120.00	\$19,264.00

Total Due This Invoice: \$41,312.51

1 Timothy W. Burns (admitted *pro hac vice*)
WI Bar 1068086

2 Jesse J. Bair (admitted *pro hac vice*)
WI Bar 1083779

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7 *Special Insurance Counsel to The Official Committee of Unsecured Creditors*

8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 In re

12 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

13 Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

CERTIFICATE OF SERVICE

14 I, Brenda Horn-Edwards, declare that I am employed in the County of Dane, State of
15 Wisconsin. I am over the age of 18 and not a party to the within action. My business address is 10
16 E. Doty Street, Suite 600, Madison, Wisconsin 53703.

17 On October 30, 2025, I served a true and correct copy of the **Monthly Professional**
18 **Fee Statement for Burns Bair LLP for September 2025** in the manner stated below:

19 <input checked="" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to 20 controlling General Orders and LBR, the foregoing document was served by the court via NEF 21 and hyperlink to the document. On October 30, 2025 , I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the participants on the attached Electronic Mail Notice List will receive NEF transmission at the email address stated.
22 <input checked="" type="checkbox"/>	(BY MAIL) I am readily familiar with the firm's practice of collection and processing 23 correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service 24 on that same day with postage thereon fully prepaid in Dane County, Wisconsin, in the ordinary course of business. 25 The Honorable Dennis Montali United States Bankruptcy Court 26 Northern District of California 450 Golden Gate Avenue, 16 th Floor 27 San Francisco, CA 94102



(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached Service List at the email address stated.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on
October 30, 2025, at Madison, Wisconsin.

/s/ Brenda Horn-Edwards

Brenda Horn-Edwards

ELECTRONIC MAIL NOTICE LIST

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Devin Miles Storey on behalf of Creditor John MS Roe SF
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Matthew Michael Weiss on behalf of Interested Party Appalachian Insurance Company
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Steven John Williamson on behalf of Defendant Holy Cross Catholic Cemeteries
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Harris Winsberg on behalf of Interested Party Appalachian Insurance Company
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Yongli Yang on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies
yongli.yang@clydeco.us

LIMITED SERVICE LIST

Description	Name	Address	Fax	Email
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